IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ETHICON WAVE 12 CASES LISTED IN PLAINTIFFS' EXHIBIT A

Master File No. 2:12-MD-02327 MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING BRIAN J. FLYNN, M.D. FOR WAVE 12

Defendants Ethicon, Inc. and Johnson & Johnson (collectively "Ethicon") hereby respond to Plaintiffs' Notice of Adoption of Prior *Daubert* Motion of Brian J. Flynn, M.D. for Wave 12, Dkt. 8714. Ethicon adopts and incorporates by reference the *Daubert* response in relation to Dr. Brian J. Flynn filed by Ethicon in Wave 3, Dkt. 2913. Ethicon respectfully requests that the Court deny Plaintiffs' motion, for the reasons expressed in its Wave 3 response briefing.

Respectfully submitted,

/s/ William M. Gage

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
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